

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

TESLA, INC.,	)	Case No.: 4:21-cv-00528
	)	
Plaintiff,	)	<b>JOINT STATEMENT REGARDING</b>
	)	<b>DISCOVERY STATUS AND ORDER</b>
v.	)	<b>COMPLIANCE</b>
	)	
ALEX KHATILOV.	)	Judge Yvonne Gonzalez Rogers
	)	
Defendant.	)	Complaint Filed: January 22, 2021
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Pursuant to the Court's order on Feb. 3, 2021, the parties provide the following joint status update to the Court on their ongoing discovery in this matter and compliance with the Court's Order. Following requests by Plaintiff Tesla, Defendant Khatilov has provided a list of his devices and Tesla has taken images of those devices. Defendant Khatilov has also provided access to his Dropbox account and certain other accounts. Defendant Khatilov has further provided an affidavit concerning certain questions by Tesla. The parties continue to exchange discovery in voluntary proceedings.

Defendant Tesla has served subpoenas on Dropbox, Microsoft, and Ebay. Ebay has produced documents under the subpoena. Dropbox has agreed to produce Basic Subscriber Information under the subpoena. Microsoft has objected, and Tesla is in negotiations with Microsoft to determine whether a resolution can be reached or whether a motion to compel is necessary.

Plaintiff Tesla and Defendant Khatilov have tentatively scheduled a deposition of Mr. Khatilov for April 7, 2021, though that date may be change depending on substantial completion of initial discovery, including third-party discovery. In advance of the deposition, the parties anticipate moving the Court for entry of a standard Protective Order to govern the discovery being conducted.

The Court's February 3, 2021 Order also set a Compliance Deadline for Friday, March 26, 2021. Each party hereby affirms that it is in compliance with the Court's February 3, 2021 order.

Date: March 19, 2020

<p>Signed: <u>Alex Khatilov</u></p> <p>Alex Khatilov  <i>proceeding pro se</i>  556 Chestnut Ave  San Bruno, California 94066  alex@alex.cc  650 400-4020</p> <p><i>Defendant</i></p>	<p>Signed: <u>Joseph Alm</u></p> <p>Joseph Alm, CA Bar # 294362  Tesla, Inc.  901 Page Avenue  Fremont, California 94538-734  jalm@tesla.com  (650) 681-5000</p> <p><i>Counsel for Plaintiff</i>  TESLA, INC.</p>
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